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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

UNITED STATES OF AMERICA,) CASE NO. CR 11-00742 KAW
)
 Plaintiff,) APPLICATION OF THE UNITED STATES FOR
 v.) AN ORDER OF FORFEITURE
)
VISHAL DASA, ANJI REDDY DIRISINALA,)
RAMAKRISHNA REDDY KARRA, AND)
TUSHAR TAMBE,)
)
 Defendants.)

The United States of America, by and through the undersigned Assistant United States Attorneys, respectfully submits this Application of the United States for an Order of Forfeiture in the above-captioned case. In support thereof, the United States sets forth the following:

On March 21, 2013, defendants Vishal Dasa, Anji Reddy Dirisinala, and Ramakrishna Reddy Karra (hereinafter “defendants”) were charged by Superseding Information with violation of Title 18, United States Code, Section 371 (Conspiracy to Commit Unauthorized Access of a Government Computer). The Superseding Information also sought criminal forfeiture pursuant to Title 18, United

1 States Code, Section 982(a)(2)(B) of:

2 Any property, real or personal that constitutes, or is derived from,
3 proceeds obtained directly or indirectly from the commission of the
offense of conviction.

4 (hereinafter "money judgment")

5 On April 1, 2013, defendant Dasa pled guilty to the Superseding Information charging him with
6 Conspiracy to Commit Unauthorized Access of a Government Computer, in violation of Title 18, United
7 States Code, Section 371. Defendant also agreed to forfeit the following property to the United States:

8 \$4,375 in United States currency... which constitutes or is derived from the
9 proceeds obtained directly or indirectly from the charge....

10 ("Dasa money judgment")

11 On April 1, 2013, defendant Dirisanala pled guilty to the Superseding Information charging him
12 with Conspiracy to Commit Unauthorized Access of a Government Computer, in violation of Title 18,
13 United States Code, Section 371. Defendant also agreed to forfeit the following property to the United
14 States:

15 \$18,270 in United States currency... which constitutes or is derived from the
16 proceeds obtained directly or indirectly from the charge....

17 ("Dirisanala money judgment")

18 On April 1, 2013, defendant Karra pled guilty to the Superseding Information charging him with
19 Conspiracy to Commit Unauthorized Access of a Government Computer, in violation of Title 18, United
20 States Code, Section 371. Defendant also agreed to forfeit the following property to the United States:

21 \$4,810 in United States currency... which constitutes or is derived from
22 the proceeds obtained directly or indirectly from the charge....

23 ("Karra money judgment")

24 Rule 32.2 (b)(1) of the Federal Rules of Criminal Procedure provides that as soon as practicable
25 after entering a guilty verdict or accepting a plea of guilty or nolo contendere on any count in an
indictment or indictment with regard to which criminal forfeiture is sought, the court shall determine
26 what property is subject to forfeiture under the applicable statute. If forfeiture of specific property is
27 sought, the court shall determine whether the government has established the requisite nexus between
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1 the property and the offense. If the government seeks a personal money judgment against the defendant,
2 the court shall determine the amount of money that the defendant will be ordered to pay. The court's
3 determination may be based on evidence already in the record, including any written plea agreement or,
4 if the forfeiture is contested, on evidence or information presented by the parties at a hearing after the
5 verdict or finding of guilt. Rule 32.2(c)(1) provides that "no ancillary proceeding is required to the
6 extent that the forfeiture consists of a money judgment".

7 At sentencing - or at any time before sentencing if the defendants consent - the orders of
8 forfeiture become final as to the defendants and shall be made part of their sentences and included in the
9 judgments. The court may include in the orders of forfeiture conditions reasonably necessary to
10 preserve the property's value pending any appeal.

11 Accordingly, that property is subject to forfeiture to the United States pursuant to Title 18,
12 United States Code, Section 982(a)(2)(B). THEREFORE, the United States respectfully requests that the
13 Court enter the proposed Order of Forfeiture, directing that:

- 14 1. Defendant Dasa defendant pay the sum of \$4,375;
- 15 2. Defendant Dirisanala pay the sum of \$18,270; and
- 16 3. Defendant Karra pay the sum of \$4,810.

17 Dated: 12/3/13

Respectfully submitted,

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19 /S/

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